

Via email to regcomments@ncua.gov

February 23, 2010

The Honorable Debbie Matz Chairman, National Credit Union Administration 1775 Duke Street Alexandria, VA 22314-3428

The Honorable Gigi Hyland Board Member, National Credit Union Administration

The Honorable Michael E. Fryzel Board Member, National Credit Union Administration

Re: Comments on the Proposed Revision of Part 704

To Chairman Matz, Board Member Hyland, and Board Member Fryzel:

I have been involved with credit unions since 1975 and had the opportunity to watch and participate in the transition of the central credit union system to the corporate credit union system to support natural person credit unions in the 1970 and 1980s. I trust the corporate credit union system. What happened to the system was neither a direct reflection of NCUA's oversight nor violation of trust by our corporate credit union management.

I do trust particularly the Management of Southwest Corporate Federal Credit Union and their ability to evaluate the proposed revisions to Part 704. I have reviewed their responses and concur the revisions as proposed will restrict the operations of the system to the extent of extinction. I recognize NCUA's mission is to protect the Share Insurance Fund...and the Corporates are to serve the natural person credit unions. There has to be a balance between safety and soundness and ability to fulfill their mission.

I could list all the details from the Southwest Corporate Federal Credit Union response to make this lengthy and "look good" and I won't! I will request that you consider their comments mine and take into considerations their serious concerns about the impact the changes in the regulations can have on future of the Corporate Credit Union System. It is imperative that credit unions have a corporate credit union system to support our activities of serving our members and that it be structured for the balance addressed above.

I urge you to listen openly to the input and give fervent consideration to the recommendations!

With High Regard,

₩. Martin Tressell President/CEO